1 2 3 4 5 6 7 8 9	George M. Kraw (SBN 71551) Katherine A. McDonough (CA Bar No. 241426) Donna L. Kirchner (SBN 138320) KRAW AND KRAW LAW GROUP 605 Ellis Street, Suite 200 Mountain View, CA 94043 Telephone: (650) 314-7800 Facsimile: (650) 314-7899 gkraw@kraw.com kmcdonough@kraw.com dkirchner@kraw.com Counsel for Plaintiffs Carpenters Pension Trust Fund for Northern California; and Board of Trustees, Carpenters Pension Trust Fund for Northern California
10	UNITED STATES DISTRICT COURT
11	NORTHERN DISTRICT OF CALIFORNIA
12	SAN FRANCISCO / OAKLAND DIVISION
13	
	CARPENTERS PENSION TRUST FUND) Case No.: C13-1063 SC FOR NORTHERN CALIFORNIA, et al.,
14) STIPULATION AND [PROPOSED] ORDER Plaintiffs, GRANTING LEAVE TO FILE PRIVILEGE
15	v. Log
16	LINDQUIST FAMILY LLC, et al., Honorable Donna Ryu
17 18	Defendants.
10	WHIEDEAS this count issued on order on Nevember 10, 2012 (see dealest no 29), much ding
20	WHEREAS this court issued an order on November 19, 2013 (see, docket no. 28), precluding
	the parties from filing any exhibits with any joint letters regarding discovery disputes; and
21	WHEREAS Plaintiffs and non-party Lauren Bockmiller (a member of Defendant Lindquist
22	Family LLC) will be filing a joint letter today regarding a discovery dispute that primarily involves a
23	claim of attorney-client privilege by Ms. Bockmiller on behalf of Defendants Lindquist Family LLC
24	and Defendant Elsie Lindquist; and
25	WHEREAS Plaintiffs and Ms. Bockmiller believe that submission of the Revised Privilege
26	Log will assist the court in evaluating their respective positions;
27	THEREFORE,
28	Plaintiffs and Ms. Bockmiller hereby stipulate and jointly request that the court grant leave

for them to submit a copy of the Revised Privilege Log in connection with their joint letter. 1 DATED: December 2 2013 2 KRAW & KRAW LAW GROUP 3 4 Attorneys for Carpenters Pension Trust Fund for Northern 5 California; and Board of Trustees, Carpenters Pension Trust 6 Fund for Northern California 7 DATED: December 8 McINERNEY & DILLON 9 10 Attorney for Defendants Lindquist Family LLC and Elsie 11 Lindquist (and representing non-party Lauren Bockmiller in 12 connection with the subpoenas served on her in this action) 13 For good cause shown, IT IS SO ORDERED. 14 12/17/13 Dated: 15 16 Hon. Donna M. Ryu UNITED STATES MAGISTRATE JUDGE 17 18 19 20 21 22 23 24 25 26

Case 3:13-cv-01063-SC Document 33 Filed 12/17/13 Page 2 of 2

27

28